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**BELLSOUTH**

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Kathleen B. Levitz  
Vice President-Federal Regulatory  
June 9, 1998

RECEIVED

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Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Written Ex Parte in:  
CC Docket No. 97-208, CC Docket No. 97-231,  
CC Docket No. 97-121, CC Docket No. 97-137,  
CC Docket No. 96-98, and CC Docket No. 98-56

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has responded today in a written ex parte to requests for information not previously included in the record of any of the proceedings listed above. The staff made its request for this information at a meeting with representatives of BellSouth Corporation that occurred on May 26, 1998. We have already filed with you the required notice of this meetings, at which we discussed issues related to the requirements of Sections 251 and 271 the Communications Act of 1934, as amended.

Pursuant to Section 1.1206(a)(1) of the Commission's rules, we are filing two copies of this notice and that written ex parte presentation. Please associate this notification with the above-referenced proceedings.

Sincerely,

Kathleen B. Levitz  
Vice President - Federal Regulatory

Attachment

cc: Carol Matthey  
Joe Welch

**Kathleen B. Levitz**  
Vice President-Federal Regulatory

June 9, 1998

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Ms. Carol Matthey, Chief  
Policy and Program Planning Division  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, D.C. 20554

Re: Written Ex Parte in:  
CC Docket No. 97-208, CC Docket No. 97-231,  
CC Docket No. 97-121, CC Docket No. 97-137,  
CC Docket No. 96-98 and CC Docket No. 98-56

Dear Ms. Matthey:

On May 26, 1998, representatives of BellSouth met with you and your staff to discuss issues relating to BellSouth's compliance with the requirements of Section 271(c)(2)(B). At that time the staff asked for the information included as an Attachment to this letter.

If after reviewing the attachments your staff concludes that it needs additional or different information, please call me at (202) 463-4113.

Pursuant to Section 1.1206(a)(1) of the Commission's rules, we have filed with the Secretary of the Commission two copies of this written ex parte presentation in each of the proceedings listed above.

Sincerely,

Kathleen B. Levitz  
Vice President - Federal Regulatory

Attachment

cc: Joe Welch

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

ADMINISTRATIVE SESSION

47 Trinity Avenue  
Atlanta, Georgia

Tuesday, April 21, 1998

The Administrative Session was called to order  
pursuant to Notice at 10:10 a.m.

Present were:

MAC BARBER, Chairman  
BOB DURDEN, Vice Chairman  
STAN WISE, Commissioner  
ROBERT BAKER, Commissioner  
-and-  
DAVE BAKER, Commissioner  
(by teleconference)

1 (Commissioners D. Baker, S. Wise, R. Baker, R.  
2 Durden and M. Barber present and voting.)

3 CHAIRMAN BARBER: Let us go now to R-9, Docket  
4 Number 8354-U. Chair recognizes -- Yeah, David, recognize  
5 yourself.

6 MR. BURGESS: Good morning, Mr. Chairman. This is  
7 David Burgess with the Commission Staff.

8 Item Number R-9 is 8354-U. This is the Public  
9 Service Commission's investigation into the development of  
10 electronic interfaces for BellSouth Telecommunications  
11 Operations, the company's operational support systems, and  
12 specifically this is consideration of decision in the matter  
13 of the Staff's workshop report and recommendation.

14 This proceeding was established as a result of the  
15 Commission's order issued in Docket Number 7253-U, which  
16 dealt with BellSouth's revised SGAT. In that October 30,  
17 1997 order the Commission directed the Staff to conduct a  
18 technical workshop to discuss and propose any necessary  
19 enhancements to BellSouth's OSS systems that would aid CLEC's  
20 entry into the local exchange market.

21 The Commission also in that order directed the  
22 Staff to file a report with the Commission summarizing its  
23 recommendations within 14 days after the conclusion of that  
24 workshop. The first notice of the workshop was issued on  
25 November 14, 1997. In that notice CLECs were given an

1 opportunity to file comments regarding BellSouth's OSS  
2 systems. BellSouth was allowed to respond to those comments  
3 filed by the CLECs on December 2nd. After reviewing the  
4 initial comments that were filed in this proceeding, the  
5 Staff used these comments as a framework for the issues to be  
6 discussed in the context of the workshop. The workshop was  
7 held on December the 9th and the 10th, and during the  
8 workshop the Staff discussed some 100 issues -- approximately  
9 100 issues that were brought to the Staff's attention by the  
10 parties.

11 At the conclusion of the workshop the Staff issued  
12 a report on December 23, 1997. That report was in the form  
13 of a matrix which contained the Staff's direct  
14 recommendations and proposed solutions, implementations for  
15 those solutions. The parties were allowed an opportunity to  
16 comment to the Staff report. After receiving those comments,  
17 this Commission conducted evidentiary hearings during March  
18 18th through the 20th. The parties filed briefs in the  
19 matter on March 30th, and the matter is ready for decision  
20 this morning.

21 In this case the Staff specifically recommends that  
22 the Commission adopt the Staff's report in total and issue an  
23 order that will cause BellSouth to fully comply with all the  
24 recommendations and implementation dates contained within the  
25 Staff's report.

1           The Staff further asks that this Commission order  
2 BellSouth to comply with some of the implementation dates  
3 which have passed or which will already have passed by the  
4 time this Commission issues an order in this matter.

5           And the third thing the Staff is asking, that the  
6 Commission also approve the revised schedule as contained  
7 within the report that would cause the industry to file  
8 surveillance reports with this Commission updating the  
9 Commission on the progress of the implementation of the  
10 Staff's proposed solutions, as well as we feel like this  
11 format will offer a good venue for effective continual  
12 conversations occurring among the parties.

13           One final note, I would like to say that BellSouth,  
14 in the Communications Committee meeting, raised an issue  
15 regarding cost recovery for these enhancements. I want to  
16 direct the Commission's attention to the order that the  
17 Commission issued in docket 7061-U, which was a cost study  
18 docket in which the Commission said in that order that  
19 BellSouth would submit to this Commission a compilation of  
20 the costs of these OSS systems and the Commission would  
21 review that cost data and determine an appropriate rate  
22 recovery mechanism for such.

23           So with that, I'll answer any questions the  
24 Commission might have of me.

25           COMMISSIONER R. BAKER: With that, I don't believe

1 the Commission will have any questions -- Oh, well, I was  
2 wrong.

3 The Chair recognizes Mr. Robert Baker.

4 COMMISSIONER R. BAKER: The Staff's recommendation,  
5 Mr. Burgess, is to take up at a later time any requests for  
6 cost recovery that may be made by BellSouth due to  
7 expenditures associated with the necessary enhancements  
8 requested by the CLECs?

9 MR. BURGESS: More specifically, Commissioner  
10 Baker, the Commission's order directs BellSouth to file with  
11 this Commission a compilation of that cost in the context of  
12 7061-U, and the Commission will conduct its review of those  
13 costs and determine an appropriate rate recovery mechanism  
14 for such costs.

15 COMMISSIONER R. BAKER: Thank you, Mr. Burgess.

16 CHAIRMAN BARBER: Gentlemen, any further questions  
17 of Mr. Burgess?

18 COMMISSIONER D. BAKER: Mr. Chairman?

19 CHAIRMAN BARBER: The Chair recognizes Mr. Dave  
20 Baker.

21 COMMISSIONER D. BAKER: Mr. Burgess, I've got a  
22 couple of little items I need to ask you about. Can you hear  
23 me okay?

24 MR. BURGESS: Yes, sir.

25 CHAIRMAN BARBER: You are coming through loud and

1 clear.

2 COMMISSIONER D. BAKER: Let me say first and  
3 foremost that I think you and the Staff did an outstanding  
4 job of organizing these workshops and putting together this  
5 matrix -- or this recommendation in the form of a matrix, and  
6 let me say that I support it.

7 One or two tweaks I want to ask you about. Page 1,  
8 Pre-ordering, Item 2, Customer Service Record, Proposed  
9 Solution B. Are you with me?

10 MR. BURGESS: Yes, sir.

11 COMMISSIONER D. BAKER: You say, BST shall make  
12 this information available via fax and electronically through  
13 LENS.

14 Mr. Chairman, I am not making a motion, but I would  
15 be more comfortable if we did not have a reference to via  
16 fax. The reason being, anything that can be sent via fax can  
17 also be sent through the web base interface of LENS, so there  
18 would be no reason to send via fax, and I don't want us to  
19 get in a situation where a fax is sent, but there is no  
20 electronic communication, and therefore, partial compliance  
21 is claimed.

22 And then on page 2 I have two questions for you.

23 COMMISSIONER WISE: Well, let's take them one at a  
24 time.

25 MR. BURGESS: Mr. Chairman, my response --



1 CHAIRMAN BARBER: Chair recognizes Mr. Burgess.

2 MR. BURGESS: Commissioner Baker, at the choice of  
3 several of the CLECs, they submit their orders through the  
4 fax mode. They do not use the electronic OSS system. It is  
5 by their choice and they choose in some cases to have the  
6 customer service record faxed to them rather than utilize the  
7 electronic interfaces. So it is an option to the CLEC. It's  
8 at the CLEC's request that they have also the opportunity to  
9 submit their orders through fax, via fax, as well as receive  
10 their customer service record through fax. They simply did  
11 not choose to use the electronic systems.

12 COMMISSIONER D. BAKER: Okay. Well, then, you've  
13 answered that question to my satisfaction. Thank you.

14 CHAIRMAN BARBER: Mr. Dave Baker, then, the  
15 reference to via fax is settled?

16 COMMISSIONER D. BAKER: Correct. Thank you.

17 CHAIRMAN BARBER: Thank you. Let's go to the  
18 second question.

19 COMMISSIONER D. BAKER: At page 2, Proposed  
20 Solution B. The potential issue is failure to provide  
21 information regarding promotional offerings. The proposed  
22 solution is somewhat vague in that it says, BST is currently  
23 providing this information in a paper format and will  
24 determine whether an electronic version can be provided.

25 Where are we on that?

1 MR. BURGESS: Commissioner Baker, my understanding  
2 is that the information is being provided electronically now  
3 on the web page. So CLECs can access the promotional  
4 offerings off of the web page. The information is up and  
5 running.

6 COMMISSIONER D. BAKER: Okay. So that is  
7 available?

8 MR. BURGESS: It is available. That's correct.

9 CHAIRMAN BARBER: Mr. Dave Baker, is that a  
10 satisfactory response to your second inquiry?

11 COMMISSIONER D. BAKER: Yes, it is. Thank you.

12 Last question, Mr. Burgess. Same page under the  
13 Implementation Time Frames, down on Item H.

14 MR. BURGESS: Yes, sir, I'm with you.

15 COMMISSIONER D. BAKER: Pre-ordering, Item 3-H.  
16 The implementation time frame is scheduled for the end of  
17 1998, and that's later than almost any other deadline in the  
18 implementation time frame. Everything else is basically  
19 first quarter of '98 under the old time frame. Why is this  
20 so much later?

21 MR. BURGESS: Couple of reasons, Mr. Chairman.  
22 This interface is in the very early development stages. I  
23 think one thing that was expressed by the participants in the  
24 workshop is, the CLECs wanted to have some input in the  
25 process in determining exactly what this interface would look

1     like. I think one of the reasons why we extended this time  
2     frame to the end of the year was to ensure that when this  
3     interface is built that CLECs will have an opportunity to  
4     have their say-so and ensure that the functionalities that  
5     they desire are included in the API interface, and my  
6     understanding is that while we've given a date here as of the  
7     end of 1998, the possibility lies that this interface may be  
8     online in the late September, early October time frame. But  
9     we put this date in here. We felt that the end of 1998 was  
10    appropriate based on the conversations that we had at the  
11    workshop.

12               COMMISSIONER D. BAKER: Thank you. You've answered  
13    my third and final question, and Mr. Burgess, I appreciate  
14    your straightforward answers, and Commissioners, I appreciate  
15    your indulgence in letting me have this little exchange.

16               CHAIRMAN BARBER: Thank you, Mr. Dave Baker, for  
17    your inquiries.

18               Any other inquiries or questions of Mr. Burgess?

19               (No response.)

20               CHAIRMAN BARBER: Any comments concerning docket  
21    number 8354-U?

22               (No response.)

23               CHAIRMAN BARBER: Then are you ready for the  
24    question? Any objection for approving the Staff report in  
25    this docket?

1 (No response.)

2 CHAIRMAN BARBER: The Chair hears no objection.  
3 Let the record show then that this docket has been approved  
4 unanimously. Thank you.

5 (Commissioners D. Baker, R. Baker, R. Durden, S.  
6 Wise and M. Barber present and voting.)

7 CHAIRMAN BARBER: Thank you, Mr. Burgess.

8 Let us go now to R-10, Docket Number 7253-U. Mr.  
9 Sewell.

10 MR. SEWELL: Dennis Sewell of the Commission Staff.

11 R-10 is Docket Number 7253-U. It is BellSouth  
12 Telecommunications consideration of revised and updated  
13 Statement of Generally Available Terms and Conditions and  
14 BellSouth's anticipated notice of its Section 271 Application  
15 under the Telecommunications Act of 1996.

16 We're asking that the Commission approve the  
17 scheduling order for both 7253-U and 6863-U.

18 The first one which is Docket Number 7253-U, we're  
19 asking for a single round of comments as opposed to going to  
20 a full hearing on this again, and we are also asking that  
21 those who filed comments in this will be in compliance with  
22 the Commission's data request in docket number 5778-U. We  
23 ask that these comments be filed with the Commission by May  
24 8, 1998, and also that these comments be limited to those  
25 sections of 251 and 252 of the Telecommunications Act

**PRE-ORDERING**

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	BELLSOUTH RESPONSE
<b>1. RSAG/LENS</b>  a. Download of RSAG has not been provided.  b. Information provided to BST (e.g. Connect Through and QuickServe) is not provided to CLECs.  c. Requires multiple screen process and repeated address validation.  d. Human to machine interface requires dual entry of info.	a. BST shall make download of RSAG available, and provide for periodic updates of information.  b. Not an issue (BST providing through LENS browser, CGI interface, and EC-LITE).  c. BST has stated that it will revise this inquiry process.  d. Proposed API interface will alleviate many of these problems.	a. January 30, 1998  b. N/A  c. January 30, 1998  d. January 28, 1998 (Vendor selected) (Implementation by the end of 1998)	a. Adopted. BellSouth has agreed to provide a download of RSAG to MCI provided MCI agrees to pay the cost associated with downloading the database. Once the cost issue is addressed, BellSouth will provide the download to MCI.  b. N/A  c. Adopted with change to implementation timeframe to February 2, 1998. DONE.  d. Not adopted. See written response for explanation.
<b>2. Customer Service Record</b>  a. Not given access to the same CSR information BST uses and are limited to printing 50 pages.  b. Rates of services and equipment items displayed on CSR are not presented in LENS.	a. BST currently limits its retail operation to a 54 page print limit. The proposed API interface will eliminate this current limitation.  b. BST shall make this information available via fax and electronically through LENS.	a. January 28, 1998 (Vendor selected) (Implementation by the end of 1998)  b. January 30, 1998	a. Adopted. API will implement an agreed to method to print CSR pages.  b. Not adopted. See written response for explanation.

c. No "refer to" number is provided on certain CSRs. CLECs must call LCSC to obtain the number.	c. Not an issue	c. N/A	c. N/A
<b>3. Limited Products and Services</b>			
a. A complete list of all valid "USOCs" has not been provided to the CLECs.	a. BST shall make a complete list of valid USOCs available to CLECs and provide monthly updates to this information.	a. January 30, 1998	a. Adopted.
b. Failure to provide information regarding promotional offerings.	b. BST is currently providing this information in a paper format and will determine whether an electronic version can be provided.	b. December 17, 1997 (Notice of Availability)	b. Adopted with change to implementation timeframe. BellSouth will determine whether an electronic version of all USOCs can be provided by January 30, 1998. DONE.
c. Failure to provide blocks of DID numbers and DID trunk inquiry	c. BST shall make blocks of ten DID numbers available electronically.	c. March 30, 1998	c. Adopted with change to implementation timeframe to June 30, 1998 for EC-Lite, August 30, 1998 for API, December 31, 1998 for LENS.
d. Lack of accurate PSIMS information and is received by batch file.	d. BST shall make accurate information available in PSIMS.	d. January 30, 1998	d. Adopted with change to implementation timeframe to June 30, 1998 for LENS, August 30, 1998 for API.
e. LENS is not designed to accommodate Unbundled loop and certain complex resale orders.	e. This issue is addressed in 1a of Ordering.	e. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	e. See Ordering Issue 1a.
f. PIC information is not listed in an efficient manner.	f. BST shall add a search capability for PICs in LENS.	f. March 30, 1998	f. Adopted with change to implementation timeframe to December 31, 1998. In order to utilize this feature, CLECs will need to enable the JAVA feature on the Netscape browser.
g. ESSX and MultiServe information is not available.	g. This issue is addressed in 1g of Ordering.	g. March 30, 1998	g. See Issue 1g.
h. LENS is limited to a maximum of 6 lines per residence or business request	h. The proposed API interface will eliminate these limitations.	h. End of 1998	h. See response to Pre-Ordering issue 1d and

and a maximum of 20 features per line.			written response for explanation.
<p><b>4. Telephone Number Resources</b></p> <p>a. Limits number reservation to six numbers/LENS session and 100 numbers/end office.</p> <p>b. BST's RNS system automatically generates a telephone number to offer a customer but CLECs must use telephone number reservation in LENS.</p> <p>c. CLECs cannot determine NXX codes available to offer customers.</p> <p>d. BST does not provide parity of access to vanity numbers.</p> <p>e. BST does not enable CLECs to hold a telephone number for 30 days without using cumbersome (firm order mode) of LENS. In the (inquiry mode) CLECs may only make reservations for 9 days.</p> <p>f. ATLAS information is received by a periodic file data transfer.</p>	<p>a. BST is removing 100 number limit for LENS and EC-Lite.</p> <p>b. BST is providing telephone number availability in a sufficient manner.</p> <p>c. This information is currently provided in LERG. The proposed API interface will also make this information available.</p> <p>d. BST is providing vanity number availability in a sufficient manner.</p> <p>e. BST shall make 30 day number reservation available to CLECs.</p> <p>f. Not an issue.</p>	<p>a. January 5, 1998</p> <p>b. N/A</p> <p>c. N/A</p> <p>d. N/A</p> <p>e. March 30, 1998</p> <p>f. N/A</p>	<p>a. Adopted with change to implementation timeframe to January 30, 1998. DONE January 15, 1998.</p> <p>b. N/A</p> <p>c. N/A</p> <p>d. N/A</p> <p>e. Adopted. See written response for condition. DONE February 6, 1998.</p> <p>f. N/A</p>
<p><b>5. Due Dates</b></p> <p>a. Access for calculation of due date is not available.</p>	<p>a. BST shall provide a full due date calculation capability in the pre-ordering mode of LENS.</p>	<p>a. April 30, 1998</p>	<p>a. Adopted with change to implementation timeframe to December 31, 1998.</p>

<p>b. Dates given are not firm, also the date is assigned by BellSouth after it is entered into BellSouth's system.</p> <p>c. If technician is needed, it would not be known to the CLEC. Technician time could be wasted.</p> <p>d. Limited appointment time.</p> <p>e. Access to dedicated facilities info available only after due date is assigned.</p> <p>f. Changes to due date requires a phone call to LCSC.</p> <p>g. Firm Order Confirmation delays.</p>	<p>b. This issue is addressed in 2i of Ordering.</p> <p>c. Not an issue (Connect-Through and Quick Serve will solve the problem).</p> <p>d. BST is providing this information in a sufficient manner.</p> <p>e. This information is presently being provided through Quick Serve, and the proposed API interface will address this issue long-term.</p> <p>f. This issue is addressed in 4a of Ordering.</p> <p>g. This issue is addressed in 2i of Ordering.</p>	<p>b. January 30, 1998</p> <p>c. N/A</p> <p>d. N/A</p> <p>e. N/A</p> <p>f. N/A</p> <p>g. January 30, 1998</p>	<p>b. See Ordering Issue 2i</p> <p>c. N/A</p> <p>d. N/A</p> <p>e. N/A</p> <p>f. N/A</p> <p>g. See Ordering Issue 2i</p>
<p><b>6. Editing Capabilities</b></p> <p>a. BellSouth relies upon machine to human interactions.</p> <p>b. Prevent on-line edit checks, order rejects and must be resubmitted.</p>	<p>a. This issue is addressed in 4a of Ordering.</p> <p>b. This issue is addressed in 4a of Ordering.</p>	<p>a. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER</p> <p>b. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER</p>	<p>a. See Ordering Issue 4a</p> <p>b. See Ordering Issue 4a.</p>
<p><b>7. System Capacity</b></p> <p>a. RSAG and LENS lack sufficient capacity to meet reasonable demand.</p> <p>b. System Lock-Out and Time-Out</p>	<p>a. BST is installing new software to resolve this problem.</p> <p>b. BST is installing new software to resolve this problem.</p>	<p>a. December 12, 1997</p> <p>b. December 12, 1997</p>	<p>a. Adopted. Documentation submitted.</p> <p>b. Adopted. New software installed.</p>
<p><b>8. Systems Integration</b></p>			



a. LENS is an interim system that does not provide machine to machine access to BST's legacy systems.	a. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	a. LENS specifications provided December 12, 1997	a. Adopted. Specifications have been provided.
b. LENS pre-ordering interface is not integrated with its EDI ordering interface.	b. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	b. CGI specifications available December 15, 1997	b. Adopted. Specifications have been provided.
c. BST has failed to provide real-time machine to machine access to Direct Order Entry Support Applications Program ("DSAP")	c. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	c. December 31, 1997	c. Adopted. Specifications have been provided.
d. Technical specifications have not been provided to CLECs so they can transfer information into their systems without manual intervention.	d. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	d. December 31, 1997	d. Adopted. Specificaitons have been provided.

#### **MAINTENANCE AND REPAIR**

<b>POTENTIAL ISSUE</b>	<b>PROPOSED SOLUTION</b>	<b>IMPLEMENTATION TIME FRAME</b>	<b>BELLSOUTH'S RESPONSE</b>
<b>1. Limited Application</b>			
a. Electronic Bonding Interface (EBI) only provides full service for access special circuits.	a. BST is implementing EBI with AT&T.	a. February 2, 1998	a. Adopted. Date moved to March 2, 1998 at AT&T's request.
b. TAFI only supports basic local exchange services. All others require manual intervention by BST personnel.	b. EBI will accommodate all services.	b. February 2, 1998	b. Adopted. Date moved to March 2, 1998 at AT&T's request.
<b>2. Electronic Capabilities</b>			
a. BST has not provided EBI for telephone number-based service.	a. BST shall provide TAFI specifications to CLECs.	a. January 30, 1998	a. Adopted. EBI does support telephone number based services.
b. No electronic capability to send/receive status on any local telephone service.	b. Implementation of EBI will address this issue.	b. February 2, 1998	b. Adopted. Date moved to March 2, 1998 at AT&T's request.

c. Electronically issued orders are manually entered into BST system.	c. Implementation of EBI will address this issue.	c. February 2, 1998	c. Adopted. Date moved to March 2, 1998 at AT&T's request.
<b>3. System Capacity</b>			
a. TAFI lacks sufficient capacity to meet demand (i.e. simultaneous users).	a. BST will add capacity to accommodate more users as needed.	a. As needed	a. Adopted.
<b>4. Long Term Solution</b>			
a. EBI-long term is not in place.	a. BST shall implement EBI. BST is not required to make enhancements to TAFI.	a. February 2, 1998	a. Adopted. Date moved to March 2, 1998 at AT&T's request.
<b>5. Integration</b>			
a. BST failed to provide technical specifications for CLECs' TAFI integration.	a. BST will provide specifications for TAFI to CLECs.	a. January 30, 1998	a. Adopted. The specifications have already been provided.
b. TAFI and LENS are not integrated.	b. BST does not integrate TAFI with its retail pre-ordering and ordering systems. BST will provide specifications for TAFI and LENS to CLECs so that they may perform their own system integration.	b. January 30, 1998	b. Adopted.

## ORDERING

<b>1. Limited Product and Services</b>			
a. LENS is not designed to accommodate unbundled loop and certain complex resale orders.	a. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	a. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	a. BellSouth adopts the solution and the proposed timeframe. If carriers want the ability to electronically order unbundled loops then EDI is the appropriate interface.
b. Limited pre-ordering and ordering gateway interface (provided by LENS and EDI) to the BellSouth resources that link to its legacy systems.	b. BST shall provide e-mail capabilities for pre-ordering and ordering complex services initially. This is in addition to the current fax capability.	b. January 30, 1998	b. See written response for BellSouth's proposal. If the Change Management team agrees upon parameters, implementation timeframe will be April 30, 1998.
c. LENS and EDI support only some	c. BST in conjunction with carriers will	c. March 30, 1998	c. Adopted

resale services.	present this issue of mechanized complex orders to OBF.		
d. Failure to use industry standard feature identification codes.	d. Not an issue	d. N/A	d. N/A
e. Failure to provide a fully automated system for placing complex orders.	e. BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.	e. March 30, 1998	e. Adopted.
f. Inability of new entrants using Phase I EDI to order all services that BST now orders electronically to support its retail operations, i.e. cannot be used to order private line, Centrex, ISDN, or complex business services or unbundled network elements.	f. Issue addressed in 1a, 1b, and 1c.	f. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	f. See Ordering Issue 1a, 1b and 1c.
g. No provision for ordering capabilities for Centrex, some ISDN, MultiServ, Complex Services, private line services other than Synchronet, or all unbundled network elements when Phase II EDI interface is implemented.	g. BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.	g. March 30, 1998	g. Adopted.
h. EXACT designed for access, not local service, thus only part of the customers service, such as the loop, can be ordered electronically; the remainder of the customers order, for items such as E911, directory listings, interim number portability, etc. must be ordered through another interface such as EDI or via fax.	h. Not an issue.	h. N/A	h. N/A
i. CLEC orders placed through LENS are currently limited to a maximum of six lines per residence or business request,	i. Issue addressed in 3h of Pre-Ordering	i. End of 1998	i. See Pre-Ordering Issue 3h.

and a maximum of twenty features per line.			
<b>2. Order status</b>			
a. LENS and EDI have not led to faster provisioning of simple LSRs.	a. Not an issue at this time.	a. N/A	a. N/A
b. Communication processes fail to adequately advise CLEC's of the status of orders placed via the electronic gateways.	b. Not an issue at this time.	b. N/A	b. N/A
c. Sufficient notices not provided to CLEC e.g. service jeopardies, rejects competitive disconnects, circuit based services.	c. In the interim, BST will work with carriers on the provision of timely notices.	c. January 30, 1998	c. Adopted.
d. Treatment of CLEC orders as two orders - one to disconnect and one to reconnect.	d. BST is installing software to resolve this issue. BST will verify memory call item is resolved also.	d. January 5, 1998	d. Adopted with change to implementation timeframe to January 12, 1998. DONE.
e. Failure to provide adequate flow-through for POTs resale and UNE orders.	e. BST will share edits and all scenarios which produce order fall out for manual processing.	e. December 19, 1997	e. Adopted. BellSouth will share all edits on or before January 30, 1998. DONE.
f. Failure to disclose internal editing and data formatting requirements.	f. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	f. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	f. Adopted.
g. Failure to provide sufficient order summaries and/or an order summary screen.	g. BST and the CLECs have committed to resolve this issue.	g. First Quarter 1998	g. BST will work with CLECs to resolve this issue. Implementation timeframe change to December 31, 1998.
h. No means for CLECs to access and view pending orders.	h. BST and the CLECs have committed to resolve this issue.	h. First Quarter 1998	h. Adopted with change to implementation timeframe to November 1, 1998 for API, December 31, 1998 for EDI.
i. Lack of a system that provides adequate FOC information - the 'soft' FOC	i. BST shall provide the same guarantee of FOC information to CLEC that it	i. January 30, 1998	i. Adopted.

<p>before facility availability is determined is inadequate.</p> <p>j. EDI not fully automated, e.g. more than two-thirds of orders placed through its electronic interfaces fall out for manual processing.</p> <p>k. EDI not capable of electronically transmitting necessary provisioning notices, i.e., error notices, reject notices, jeopardy notices, status reports.</p> <p>l. All necessary business rules not provided to CLECs; rules in LEO Guide in error or internally inconsistent.</p> <p>m. Batch processing is not real-time or near real-time for ordering.</p> <p>n. Access to dedicated facility information is available only after the due date is assigned and not before which would enable a representative to immediately offer the same-day service on a new install that does not require an additional line.</p>	<p>provides to its retail operations.</p> <p>j. BST will share edits and all scenarios which produce order fall out for manual processing.</p> <p>k. In the interim, BST will work with carriers on the provision of timely notices.</p> <p>l. BST shall provide business rules for CLECS for Version 7.0 of EDI, LEO, LESOG and SOER.</p> <p>m. BST will explore event-driven EDI with AT&amp;T and MCI.</p> <p>n. BST shall provide a full due date calculation capability in the pre-ordering mode of LENS.</p>	<p>j. December 19, 1997</p> <p>k. January 30, 1998</p> <p>l. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER</p> <p>m. First Quarter 1998</p> <p>n. April 30, 1998</p>	<p>j. Adopted. BellSouth will share all edits on or before January 30, 1998. DONE.</p> <p>k. Adopted.</p> <p>l. Adopted.</p> <p>m. Adopted.</p> <p>n. This issue appears to be identical to Pre-ordering issue 5e and BellSouth agrees with the staff's proposal in issue 5e.</p>
<p><b>3. Level of Manual Intervention</b></p> <p>a. Substantial number of LSRs placed via EDI being handled manually.</p> <p>b. No working EDI interface for ordering.</p> <p>c. EDI-PC not fully automated.</p> <p>d. Process for ordering unbundled</p>	<p>a. Issue addressed in 2e and 2j.</p> <p>b. Not an issue.</p> <p>c. Not an issue at this time.</p> <p>d. BST shall provide business rules to</p>	<p>December 19, 1997</p> <p>b. N/A</p> <p>c. N/A</p> <p>d. March 16, 1998 for Version 7.0</p>	<p>a. See issues 2e and 2j.</p> <p>b. N/A</p> <p>c. N/A</p> <p>d. Adopted</p>

network elements through LENS (information is entered into the "Remarks" section of the order screen and is manually retrieved and re-entered by BST).	CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	January 30, 1998 for LEO, LESOG and SOER	
c. Availability of an electronic interface that does not require manual intervention for the provisioning of unbundled loops.	e. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER	e. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	e. BellSouth adopts solution and timeframe, but notes that the solution may not directly address the issue presented.
<b>4. Edit Capabilities</b>			
a. Failure to provide electronic edit capabilities with ordering and provisioning at parity with BST. Edit to comply with OBF ordering form requirements or BST business rules.	a. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	a. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	a. Adopted.
b. Inability to submit change orders (in case of errors, customer changes order, and adding or removing features.	b. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	b. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	b. Adopted. The EDI interface has the ability to submit change orders.
<b>5. System Capacity</b>			
a. Failure to provide systems with sufficient capacity to meet anticipated or reasonable demand.	a. BST has agreed to provide the methodology utilized to calculate present system capacity and its proposed plan for expanding system capacity.	a. December 31, 1997	a. Adopted.
b. Insufficient testing of systems and test documentation.	b. Issue addressed in 1a and 1b of the General Section.	b. January 30, 1998	b. Adopted.
c. Inadequate field for directory listings.	c. Issue addressed in 1a and 1b of the General Section.	c. January 30, 1998	c. Adopted.
Note: Applies to both EDI and EDI-PC for Items 5a and 5c.			
<b>6. Integration</b>			

<p>a. LENS, EDI, and EDI-PC interfaces are not integrated to provide direct, unmitigated access to BST's legacy systems for pre-ordering and ordering functions.</p> <p>b. LENS must be utilized in combination with additional interfaces, such as the TAFI system and EDI-PC in order to meet additional CLEC needs.</p> <p>c. Insufficient information provided new entrants to develop a system compatible with BST's Phase II EDI.</p> <p>d. LENS, EDI, and EDI-PC require dual entry by entrants into their own ordering/customer records systems.</p>	<p>a. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).</p> <p>b. Not an issue.</p> <p>c. Issue addressed in 2f of Ordering and 1a and 1b of the General Section.</p> <p>d. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).</p>	<p>a. December 31, 1997</p> <p>b. N/A</p> <p>c. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER</p> <p>d. December 31, 1997</p>	<p>a. Adopted.</p> <p>b. N/A</p> <p>c. Adopted.</p> <p>d. Adopted.</p>
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## **BILLING**

<b>1. System Capability</b>			
<p>a. BST has failed to provide systems relating to detailed access usage data for UNEs for billing purposes.</p> <p>b. BST has failed to provide systems to bill for UNEs, including local loops, local transport and switching via CABs or using a CABs format.</p> <p>c. BST does not have the capability to record usage data or generate mechanized bills for many network elements. BST is not capable of providing usage sensitive billing for those UNEs that have usage sensitive</p>	<p>a. BST will provide access daily usage file (ADUF).</p> <p>b. This is a contractual issue and therefore no proposed solution is offered in the context of this technical workshop.</p> <p>c. BST shall furnish an accurate paper bill in accordance with interconnection agreements.</p>	<p>a. December 31, 1997</p> <p>b. N/A</p> <p>c. February 15, 1998</p>	<p>a. Adopted. <i>1/20/98</i></p> <p>b. N/A</p> <p>c. Adopted.</p>

pricing such as transport, switching and signaling.			
d. BST cannot electronically transmit originating and terminating recording information for interstate calls and does not know when it will be able to do so.	d. BST will provide access daily usage file (ADUF).	d. December 31, 1997	d. Adopted.
e. BST has failed to provide systems that accurately produce bills for resold services.	e. Not an issue.	e. N/A	e. N/A.
f. BST has failed to provide systems for accessing usage data for flat rate calls.	f. BST will add capability in central offices to capture data for flat rate calls.	f. December 1998	f. Not adopted. See written response for explanation.
g. BST is not providing usage rates for Information Service Provider (e.g. NII) calls even though BST agreed to in middle 1996 and are required to by the AT&T/BST Interconnection Agreement.	g. CLECs have the ability to negotiate their own contracts with ISPs.	g. N/A	g. N/A
h. BST has failed to provide systems for mechanically generated billing statements.	h. BST shall furnish an accurate paper bill in accordance with interconnection agreements.	h. February 15, 1998	h. Adopted.
<b>2. Billing Accuracies</b>			
CABs - formatted bills were to be implemented by August 2, 1997. AT&T still has not received accurate CABs bills and remains in testing with BST.	This is a contractual issue and therefore no proposed solution is offered in the context of this technical workshop.	N/A	N/A

### GENERAL

<b>1. Notice of Changes</b>			
a. Insufficient notice of changes.	a and b: BellSouth, AT&T, MCI and Sprint started	a and b: January 30, 1998	a. Adopted.



b. Insufficient documentation of specifications.	a series of meetings on December 11, 1997 to develop a Process Document addressing and resolving these "change management" issues. This series of meetings and development of the document are supposed to conclude by January 31, 1998. One additional CLEC will also be notified so that they can have some input. The parties view this as positive, interactive solution.		b. Adopted.
<b>2. Proprietary Interface</b>			
a. Interim interface	a through d:	a through d:	a through d:
b. Not compatible with industry standard EDI interfaces.	EDI & API will be based on industry standards and therefore can be integrated and available for machine-to-machine use.	EDI version 7.0 by March 16, 1998 API by December 31, 1998	Not adopted. See written response for explanation.
c. CLECs cannot integrate preordering and ordering at parity with BST.			
d. Need for machine-to-machine or Application Programming Interface for preordering.			
<b>3. Training</b>			
a. Usable specs not made available.	a. Issue addressed in 1a and 1b.	a. January 30, 1998	a. Adopted.
b. Documentation incomplete, has errors.	b. Issue addressed in 1a and 1b.	b. January 30, 1998	b. Adopted.
c. BST personnel lacks adequate training.	c. Issue addressed in 1a and 1b. Also, BST to provide feedback on orders submitted for CLEC information in training their own staff.	c. January 30, 1998	c. Adopted.
<b>4. Information</b>			
Information is not provided to show parity (i.e. CLEC tour of BST facilities).	Not a technical issue to be resolved in this docket.	N/A	N/A